



RE: Wallace Yard  
Lawrence, Robert

to:  
Clifford Villa, Wurtzler, Gail, craig.trueblood  
07/17/2009 05:19 PM

Cc:  
Darrell.Early, SHimmelh  
Hide Details

From: "Lawrence, Robert" <Robert.Lawrence@dgsllaw.com>  
To: Clifford Villa/R10/USEPA/US@EPA, "Wurtzler, Gail" <Gail.Wurtzler@dgsllaw.com>, <craig.trueblood@klgates.com>,  
Cc: <Darrell.Early@deq.idaho.gov>, <SHimmelh@enrd.usdoj.gov>  
History: This message has been replied to and forwarded.

Cliff, Darrell and Sara,

Please don't give up on the idea of handling ICP costs as future response costs just yet. What is the downside? If there are specific concerns, let's discuss on Monday. Thanks.

Thanks,

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**From:** Villa.Clifford@epamail.epa.gov [<mailto:Villa.Clifford@epamail.epa.gov>]  
**Sent:** Friday, July 17, 2009 5:55 PM  
**To:** Wurtzler, Gail; Lawrence, Robert; craig.trueblood@klgates.com  
**Cc:** Darrell.Early@deq.idaho.gov; SHimmelh@enrd.usdoj.gov  
**Subject:** Wallace Yard

Gail, Bob, Craig -

As promised, I'm attaching a description of the ICP program for the Box. This document was an attachment to the 1994 CD with the mining companies and appears to provide a fair description of the kinds of functions performed by the Panhandle Health District as part of the ICP. I don't believe that all listed program elements would apply to the Wallace Yard, but it provides some ideas.

As for ICP funding, after brief conversations with EPA clients and the State, I don't believe funding on a reimbursable basis will prove practical or acceptable to the governments. I hate to bear bad news on a Friday afternoon, but at the same time I wouldn't advise anyone now to spend time over the weekend proofreading the CD, SOW, etc.

Cliff Villa  
Assistant Regional Counsel  
U.S. EPA Region 10